

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Brian D. Blankenship

Plaintiff,

v

Outer Banks Capital, Inc.  
Attention: ANDREW GIRARD, Agent  
1464 W WEBSTER AVE  
CHICAGO, IL 60614

Westward360, Inc d/b/a Westward360 GC,  
Westward360 PC, Westward360 PROS  
Attention: David Westveer, Agent  
1464 W WEBSTER AVE  
CHICAGO, IL 60614

Nathan J. Brown, individually and  
personally  
711 North Ivy Lane  
Glencoe, IL 60022

Brent R. Straitiff, individually and  
personally  
2116 Thornwood Avenue  
Wilmette, IL 60091

Ann Marie Reilly also known as Ann  
Schenk, individually and personally  
3750 West School Street, Apartment 1  
Chicago, IL 60618

Defendants.

Case Number: 23-CV-0869

Judge Martha M. Pacold

Magistrate Judge Maria Valdez

**MOTION TO LEAVE AND REFILE AMENDED COMPLAINT &  
MOTION TO SEAL ORIGINAL COMPLAINT**

Now comes Plaintiff, filing Pro Se, and pursuant to F.R.C.P. 15(a)(2) moves this Court for leave to file its Amended Complaint, in its entirety, substituting the Original Complaint, in its entirety, filed on February 10, 2023 with the Amended Complaint filed February 23, 2023.

Plaintiff also moves this Court to seal the Original Complaint. In support thereof, Plaintiff states that:

1. The Amended Complaint is included with this Motion.
2. The Amended Complaint was also sent in via the Pro Se Box.com file submission process, per direction received late Friday.
3. The Amended Complaint is necessary to properly detail Jurisdiction and Exhaustion of Administrative Remedies which were excluded from the Original Complaint.
4. The Amended Complaint is necessary because Plaintiff inadvertently failed to redact all the details that required redaction in the Original Complaint. The Original Complaint contains personal information about Plaintiff's finances and medical history.
5. Plaintiff spoke to the Intake Help Desk late Friday and the representative, who was of great assistance, provisionally removed the Original Complaint from public view and recommended this course of action.
6. Plaintiff requests the Court to permanently seal or completely remove the Original Complaint from the case docket as the Amended Complaint replaces it in its entirety.
7. Plaintiff has not notified or served any of the Defendants.
8. Notice of Motion has not been sent to any Defendant as Plaintiff intends to use the Amended Complaint with the Waiver Request and/or to serve.

WHEREFORE, Plaintiff requests leave to file its Amended Complaint, attached hereto, and to seal the Original Complaint instanter.

DATE: February 20, 2023

Respectfully submitted,

By: /s/ Brian D. Blankenship  
Plaintiff, Pro Se

Brian D. Blankenship  
Plaintiff, Pro Se  
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